

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

FTX TRADING, LTD., *et al.*¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**ORDER GRANTING THE
APPLICATION OF THE AD HOC COMMITTEE
OF NON-US CUSTOMERS OF FTX.COM UNDER
SECTION 503(b)(3)(D) AND 503(b)(4) OF THE BANKRUPTCY
CODE FOR ALLOWANCE AND PAYMENT OF AN ADMINISTRATIVE
EXPENSE CLAIM FOR REASONABLE PROFESSIONAL FEES AND EXPENSES**

Upon the application (the “Application”)² of the Ad Hoc Committee of Non-US Customers of FTX.com (the “Ad Hoc Committee”) for entry of an order (this “Order”) allowing and authorizing reimbursement of administrative expense claims of counsel to the Ad Hoc Committee for having made a substantial contribution to the above-captioned Chapter 11 Cases pursuant to sections 503(b)(3)(D) and 503(b)(4) of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.* (the “Bankruptcy Code”); and the Court having jurisdiction pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United State Constitution; and venue of these Chapter 11 Cases and the Application in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and upon

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of Debtors in these chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the Debtors’ claims and noticing agent’s website at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Application.

the consideration of the Application; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court finding that adequate notice of the Application having been given; and that no further notice need be given; and objections (if any) to the Application having been withdrawn, resolved, or overruled on the merits; and upon the record of any hearing held to consider the relief requested in the Application; and this Court having found and determined that the legal and factual bases set forth in the Application establish good cause for the relief requested therein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Application is hereby GRANTED.
2. The Ad Hoc Committee is hereby entitled to administrative expense claims pursuant to 11 U.S.C. §§ 503(b)(3) and 503(b)(4) in the aggregate amount of \$2,759,336.80 (the “Substantial Contribution Claim”) for having made a substantial contribution to these Chapter 11 Cases.
3. The Debtors and/or the Plan Administrator, as applicable, are hereby authorized and directed to make the requisite distributions of \$2,001,775.67 to Eversheds and \$757,561.13 to Morris Nichols on account of the Substantial Contribution Claim in full in Cash as soon as practicable.
4. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.
5. The terms and conditions of this Order shall be effective and enforceable immediately upon its entry.

6. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Application or the implementation or interpretation of this Order.